

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

NORTHSTAR ENERGY LLC,
A Delaware limited liability company,
Plaintiff,
v.

ENCANA CORPORATION,
a Canadian corporation, and

ENCANA OIL & GAS USA INC.,
a Delaware corporation, and

CHESAPEAKE ENERGY CORPORATION,
an Oklahoma corporation, and

O.I.L. NIAGARAN, LLC,
a Michigan limited liability company,

Defendants.

Case No. 1:13-cv-00200-PLM

Chief Judge Paul L. Maloney

Mag. Judge Joseph G. Scoville

**O.I.L. NIAGARAN, LLC'S CROSS-
MOTION TO STAY DISCOVERY**

ORAL ARGUMENT REQUESTED

CROSS-MOTION TO STAY DISCOVERY

Pursuant to Federal Rule of Civil Procedure 26(c), Defendant O.I.L. Niagaran, L.L.C. (“OILN”) respectfully moves for a stay of discovery pending resolution of OILN’s Motion to Dismiss the Complaint. *See* Dkt. 20. The grounds for this Cross-Motion to Stay Discovery are set forth in the accompanying Brief in Opposition to NorthStar Energy LLC’s Motion to Compel Defendants to Confer Under Rule 26(f). In accordance with Rule 7.1(d) of the Local Rules of the United States District Court for the Western District of Michigan, counsel for OILN certifies that they have explained the bases for this Cross-Motion to Plaintiff’s counsel but did not obtain concurrence in the relief sought. Finally, pursuant to Rule 7.2(d) of the Local Rules, OILN requests oral argument be scheduled for this Cross-Motion with the expectation that it would assist the Court in clarifying the issues presented.

Respectfully submitted,

WILMER CUTLER PICKERING HALE AND DORR LLP
Attorneys for Defendants *Chesapeake Energy*
Corporation and O.I.L. Niagaran, L.L.C.

Dated: August 30, 2013

By: /s/ Molly S. Boast

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